In the Matter of the Search of

# UNITED STATES DISTRICT COURT

for the Southern District of Ohio

(Briefly describe the property to be searched or identify the person by name and address)	}	Case No.	2:22-mj-765			
United States Priority Mail Parcel 9505 5150 6926 2332 7841 94			·			
APPLICATION FOR A WARRANT E	BY TELEPHONE OF	R OTHER RE	LIABLE ELECTRONIC MEANS			
I, a federal law enforcement officer of penalty of perjury that I have reason to believe property to be searched and give its location):	or an attorney for the gove that on the following	government, re ig person or pr	quest a search warrant and state under operty (identify the person or describe the			
United States Priority Mail Parcel 9505 515 Ohio.	0 6926 2332 7841 94,	currently loca	ted at the USPIS office in Columbus,			
located in the Southern Distri	ct of Oh	iio	, there is now concealed (identify the			
person or describe the property to be seized):  A quantity of a controlled substance and/or 21, United States Code, Sections 841(a)(1)		dence thereof,	and/or contraband, in violation of Title			
The basis for the search under Fed. Fed. Feed evidence of a crime;	R. Crim. P. 41(c) is <i>(che</i>	eck one or more):				
contraband, fruits of crime,	or other items illegally	possessed;				
property designed for use, intended for use, or used in committing a crime;						
$\Box$ a person to be arrested or a p	person who is unlawfu	lly restrained.				
The search is related to a violation of	f:					
21 U.S.C. 843(b) Prohi	Offense Description Possession with intent to distribute a controlled substance Prohibited use of a communication center (U.S. Mail) Conspiracy to possess with intent to distribute a controlled substance					
The application is based on these factors as set forth in the attached Affidavit of		in D. Koble.				
<b>♂</b> Continued on the attached sheet.						
Delayed notice of 30 days (gas 18 U.S.C. § 3103a, the basis of v			et.			
			Applicant's signature			
		Justin D	) Koble, US Postal Inspector			
			Printed name and title			
Attested to by the applicant in accordance w						
telephone	(specify reliable	electronic means	" My (Jeanny)			
D. (	_	Chalas	V V			
Date: 12/2/2022			y M. Vascura I States Miggistrate Judge			
City and state: Columbus, Ohio			Vascura, U.S. Magistrate Judge			
City and state. Columbus, Onio		,	Printed name and title			

# IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO EASTERN DIVISION

IN THE MATTER OF THE OPENING	)		
AND SEARCH OF:	)	CASE NO.	2:22-mj-765
	)		
UNITED STATES PRIORITY MAIL	)	MAGISTRA	TE JUDGE VASCURA
PARCEL 9505 5150 6926 2332 7841 94	)		

# AFFIDAVIT IN SUPPORT OF AN APPLICATION UNDER RULE 41 FOR A WARRANT TO SEARCH AND SEIZE

I, Justin D. Koble, being duly sworn, do hereby state the following:

#### INTRODUCTION AND AGENT BACKGROUND

- 1. I am a United States Postal Inspector with the United States Postal Inspection Service ("USPIS") and have been so employed since July 2014. I am currently assigned to the Narcotics and Money Laundering Team at the USPIS's Columbus, Ohio field office. In this capacity, I am responsible for investigating the illegal use of the United States Mails for the purpose of transporting controlled substances such as methamphetamine, heroin, fentanyl, fentanyl-related analogs, cocaine, and other controlled substances, in violation of, among other statutes, Title 21, United States Code, Sections 841(a)(1) (manufacturing, distributing, or possessing with the intent to manufacture or distribute a controlled substance), 843(b) (unlawful use of a communication facility in the commission of a crime), and 846 (drug conspiracy). In addition, I am responsible for investigating possible violations of Title 18, United States Code, Sections 1956 and 1957 (money laundering).
- 2. I have been involved in the investigation and discovery of drug contraband and drug proceeds on numerous occasions. I have personally been the affiant for search warrants that have resulted in the discovery of controlled substances and drug proceeds. My current assignment to the Columbus Processing and Distribution Center ("P&DC") involves investigating the use of the US Mails by drug traffickers, in which established drug package profiles, surveillance, and drug detection dogs, among other investigative tools, are utilized.
  - 3. Experience and drug trafficking intelligence have demonstrated that Priority Mail

and Priority Mail Express are commonly used to transport drugs and drug proceeds because of their reliability and the time pressures they place on law enforcement agents to execute a successful controlled delivery.

- 4. This affidavit is made in support of an application under Rule 41 of the Federal Rules of Criminal Procedure, for a warrant to search for and seize evidence, instrumentalities, contraband, and fruits of violations of Title 21, United States Code, Sections 841(a)(1) (manufacturing, distributing, or possessing with the intent to manufacture or distribute a controlled substance), 843(b) (unlawful use of a communication facility in the commission of a crime), and 846 (drug conspiracy), from the United States Priority Mail parcel bearing United States Postal Service ("USPS") tracking number 9505 5150 6926 2332 7841 94 (hereinafter referred to as the "SUBJECT PARCEL").
- 5. The facts set forth in this affidavit are based on my personal knowledge, knowledge obtained during my participation in this investigation, knowledge obtained from other individuals, review of records related to this investigation, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. Because this affidavit is submitted for the limited purpose of establishing probable cause in support of the application for a search warrant, this affidavit does not set forth each and every fact learned by me during the course of this investigation.

#### SUBJECT PARCEL

6. On or about November 30, 2022, USPIS interdiction personnel in Columbus, Ohio interdicted the SUBJECT PARCEL upon arrival at the USPS Waverly Main Post Office, 125 East 2<sup>nd</sup> Street, Waverly, Ohio 45690. The SUBJECT PARCEL is addressed to "Alex Grey, 418 Hillside Ave, Waverly, OH 45690" with a return address of "John Brown, 6289 Palm Ave, Riverside, CA 92506". The SUBJECT PARCEL is a box wrapped in brown paper, measuring approximately 14 ¾" x 12 ¾" x 5" and weighing approximately 6 pounds, 15.1 ounces. The SUBJECT PARCEL was mailed from the USPS Riverside Main Post Office, 4150 Chicago Avenue, Riverside, California 92507 on or about November 28, 2022. The \$36.15 in United States postage affixed to the SUBJECT PARCEL was paid for using cash.



#### PROBABLE CAUSE

- 7. Among the characteristics of the drug profile possessed by the SUBJECT PARCEL is the "source state" origination of the parcel, as well as the destination of the SUBJECT PARCEL.
- 8. Your affiant submits that the origin state of the SUBJECT PARCEL bears on the issue of probable cause here. For example, US Postal Inspectors, Special Agents of the Drug Enforcement Administration ("DEA"), and other intelligence sources have identified California as a source state for illegal drugs flowing into Central Ohio and a destination state for the proceeds from the sale of these illegal drugs. Based on my training and experience, I know drug traffickers frequently utilize various shipping and mail entities, including the United States Postal Service, for the shipment of controlled substances. Frequently the same shipping entity utilized for the shipment of controlled substances is also utilized for the shipment of the proceeds derived from the sale of these controlled substances.
- 9. On or about December 1, 2022, checks of USPS, law enforcement, and opensource electronic databases were conducted to determine the validity of the destination

information contained on the SUBJECT PARCEL. The destination address, "418 Hillside Ave", was found to be a valid and deliverable address in the 45690 zip code. The name "Alex Grey" was not found to be associated with this address.

- 10. Further, on or about December 1, 2022, checks of USPS, law enforcement, and open-source electronic databases were conducted to determine the validity of the return information contained on the SUBJECT PARCEL. The return address, "6289 Palm Ave," was found to not be a valid address and is not serviced by the USPS. Because the address was found to be fictitious, the return name, "John Brown", could not be verified.
- 11. Regarding both the above-described return and destination addresses, I know through training and experience, that shippers of drugs and drug proceeds will often utilize a fictitious return address and/or a fictitious name to reduce the possibility of identification and apprehension by law enforcement. Additionally, while a valid delivery address is necessary to ensure the delivery of a parcel, a fictitious delivery name is often utilized for the same reasons previously discussed.
- 12. Because the SUBJECT PARCEL originated in California, a state known as a source of controlled substances being mailed to Central Ohio, the return address was not valid, and the recipient name was determined not to be associated with the address, investigators submitted the SUBJECT PARCEL for examination by a drug detecting canine.

#### **EXAMINATION BY DRUG DETECTING CANINE**

- 13. On or about December 2, 2022, US Postal Inspectors contacted Trooper Jeff McNamara, Ohio State Highway Patrol, who is the handler for "Dale", a Drug Detecting Canine. K-9 "Dale" has been certified by the Ohio Peace Officers Training Association since June 2022 for tracking, article search, and the detection of cocaine, heroin, methamphetamine, and their derivatives. K-9 "Dale" has had over 200 hours of training at the Ohio Highway Patrol K9 Training Facility. Both in training and actual deployments, K-9 "Dale" has successfully detected narcotics, by demonstrating clear, passive alerts, and has established himself as a highly reliable police service dog.
- 14. The SUBJECT PARCEL was hidden among other parcels and USPS mail processing equipment and K-9 "Dale" was allowed to search the entire area. Trooper McNamara concluded that K-9 "Dale" did alert positively to the SUBJECT PARCEL. Based on that alert, Trooper McNamara concluded that the odor of one or more of the drugs K-9 "Dale" is trained

and certified to detect was present.

15. Based upon training and experience, I respectfully submit that the above information is indicative of drug trafficking activity, and that, based on the above, there is probable cause to search the SUBJECT PARCEL.

16. If the SUBJECT PARCEL is found to contain controlled substances, these controlled substances will be seized as part of an ongoing drug trafficking investigation.

### **CONCLUSION**

17. Based upon the foregoing facts and my training, experience, and expertise as a US Postal Inspector, I submit there is probable cause to search the SUBJECT PARCEL for controlled substances, drug proceeds, and other evidence of violations of Title 21, United States Code, Sections 841(a)(1), 843(b), and 846.

18. WHEREFORE, I respectfully request that the Court issue a warrant, authorizing agents of the USPIS, including but not limited to other law enforcement agents and technicians assisting in the above-described investigation, to open, view, and photograph, and seize, if necessary, the SUBJECT PARCEL and its contents.

19. The above information is true and correct to the best of my knowledge, information, and belief.

Justin D. Koble

**US Postal Inspector** 

Sworn and subscribed to me

This 2 nd day of December 2022

CHELSEY W VASCURA

United States Magistrate Judge

# Attachment A

United States Postal Service Priority Mail parcel 9505 5150 6926 2332 7841 94 addressed to "Alex Grey, 418 Hillside Ave, Waverly, OH 45690"



# Attachment B

- 1.) Any controlled substances which constitute evidence of violations of Title 21, United States Code, Sections 841(a)(1), 843(b), and 846.
- 2.) United States currency and/or drug proceeds